

TO: Clerk's Office
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK



APPLICATION FOR LEAVE
TO FILE DOCUMENT UNDER SEAL

UNITED STATES OF AMERICA

-v.-

21-MJ-832

ROMAN NIKOGHOSYAN, DILSHOD
BAZAROV and MIRZOBEK BEKMURATOV

Docket Number

SUBMITTED BY: Plaintiff ___ Defendant ___ DOJ ☒

Name: Matthew R. Galeotti

Firm Name: USAO - EDNY

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INDICATE UPON THE PUBLIC DOCKET SHEET: YES ___ NO ☒

If yes, state description of document to be entered on docket sheet:

MANDATORY CERTIFICATION OF SERVICE:

A.) ___ A copy of this application either has been or will be promptly served upon all parties to this action, B.) ___ Service is excused by 31 U.S.C. 3730(b), or by the following other statute or regulation: _____; or C.) ☒ This is a criminal document submitted, and flight public safety, or security are significant concerns. (Check one)

July 19, 2021

DATE

Matthew R. Galeotti

SIGNATURE

A) If pursuant to a prior Court Order:

Docket Number of Case in Which Entered: _____

Judge/Magistrate Judge: _____

Date Entered: _____

B) If a new application, the statute, regulation, or other legal basis that authorizes filing under seal

Ongoing criminal investigation; risk of flight: _____

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THE COURT.**

DATED: Brooklyn, NEW YORK

[Signature]

July 19, 2021

U.S. MAGISTRATE JUDGE

RECEIVED IN CLERK'S OFFICE _____

DATE

JMS:MRG/DR
F. #2021R00239

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

ROMAN NIKOGHOSYAN,
also known as “Roma,”
DILSHOD BAZAROV and
MIRZOBEK BEKMURATOV,
also known as “Mirza,”

Defendants.

----- X

EASTERN DISTRICT OF NEW YORK, SS:

Todd McGee, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

In or about and between January 2021 and the present, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants ROMAN NIKOGHOSYAN, DILSHOD BAZAROV and MIRZOBEK BEKMURATOV, together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that NIKOGHOSYAN, BAZAROV and BEKMURATOV, and others, agreed to obtain property, to wit: payments of United States currency from an individual (“Victim-1”), with his consent, which consent was to be induced by wrongful use of actual and threatened force, violence and fear.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

TO BE FILED UNDER SEAL

C O M P L A I N T

(18 U.S.C. § 1951(a))

21-MJ-832

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such. I have been a Special Agent since approximately 2017. I am responsible for conducting and assisting in investigations into the activities of individuals and criminal groups responsible for racketeering and other crimes associated with organized crime, and, in particular, Eurasian organized crime. These investigations are conducted both overtly and covertly. During my tenure with the FBI, I have participated in numerous investigations of organized crime, including Eurasian organized crime, during which I have (a) conducted physical surveillance, (b) executed search warrants, (c) debriefed cooperating witnesses and victims, (d) reviewed and analyzed numerous taped conversations of those engaged in organized crime activities, and (e) monitored wiretapped conversations and prepared and reviewed linesheets. As a result of my training and experience, I am familiar with the techniques and methods used by individuals involved in criminal activity to conceal their activity from law enforcement and with the activities of members and associates of organized crime and gangs and the way in which its members and associates react to individuals who cooperate with the government against them.

2. I am familiar with the facts and circumstances set forth below from personal knowledge, my review of the investigative file, my review of wiretap interceptions, debriefings of cooperating witnesses and confidential sources, and reports of other law

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

enforcement officers involved in the investigation. Unless specifically indicated, all conversations and statements described in this affidavit are relayed in sum and substance and in part only, and transcriptions and translations of recorded conversations are in draft form and subject to revision.

3. As described herein, the object of the charged extortion conspiracy was property of Victim-1, namely United States currency. Victim-1 is a former associate of ROMAN NIKOGHOSYAN, DILSHOD BAZAROV and MIRZOBEK BEKMURATOV (or, collectively, the “defendants”).²

4. NIKOGHOSYAN, BAZAROV and BEKMURATOV are members of the KavKaz criminal enterprise (“KAVKAZ” or the “enterprise”). As described below, members and associates of KAVKAZ, including NIKOGHOSYAN, BAZAROV and BEKMURATOV, have been engaged in an ongoing extortion scheme directed at Victim-1. As part of the extortion scheme, the defendants and their co-conspirators have sought, among other things, to require Victim-1 to make payments to the defendants and their co-conspirators under threat of physical harm.

KAVKAZ

5. KAVKAZ is a criminal enterprise that operates in the Eastern District of New York and elsewhere, including by participating in the illegal conduct described herein. KAVKAZ’s largest base of operation is in Brooklyn, New York. In particular, KAVKAZ

² Victim-1 began cooperating with the FBI in or about approximately March 2021. Victim-1 is cooperating in exchange for assistance with his physical safety and the possibility of leniency to the extent any criminal enforcement action were to be brought against him for his commission of possessing with intent to distribute marijuana. Victim-1’s information has proven reliable and been corroborated by, among other things, physical surveillance, video surveillance and telephone and electronic records. Victim-1 has no criminal convictions but has twice been arrested for unlicensed operation of motor vehicles.

considers its principal territories to be the Manhattan Beach and Brighton Beach areas of Brooklyn.

6. Brooklyn-based members of KAVKAZ draw on ties to the Caucus region of Eurasia, namely Armenia, Uzbekistan, parts of Southern Russia, and Azerbaijan, in furtherance of accomplishing their criminal goals. KAVKAZ members also associate with other gangs including, for example, the Bloods street gang, a national gang which has a large contingent (“set”) in Coney Island, Brooklyn.

7. Members of KAVKAZ: refer to their membership in KAVKAZ as the “K-WAY” or “K WAY,” sometimes with multiple “A”s, including on various social media platforms. Members further use the slogan, “K-WAY is the only way”; use hand symbols to signify their association in the gang, including holding four fingers up outstretched, which signifies a “K” for KAVKAZ; and often wear jewelry or articles of clothing emblazoned with the word “KAVKAZ.”

8. The principal purpose of KAVKAZ is to generate money for its members and associates through their commission of various criminal activities, including drug trafficking, robbery and extortion, among other activities. The members and associates of KAVKAZ also further the enterprise’s purpose by threatening economic injury; using and threatening to use physical violence, including stabbings; and providing protection to its own members.

9. Although the primary purpose of KAVKAZ is to generate money for its members and associates, the members and associates at times use the resources of the enterprise to settle personal grievances and vendettas, sometimes with the approval of higher-ranking members of KAVKAZ. For those purposes, higher-ranking members of the enterprise ask and

expect other members and associates to carry out, among other crimes, acts of violence, including assaults.

10. The members and associates of KAVKAZ additionally engage in conduct designed to prevent detection of their identities, their illegal activities and the proceeds of those activities.

The Defendants and Co-Conspirator-1

11. The defendants ROMAN NIKOGHOSYAN, DILSHOD BAZAROV and MIRZOBEK BEKMURATOV are members of KAVKAZ, as evidenced, in part, by their communications and association with one another and various other enterprise members and associates captured via intercepted communications and consensual recordings. During the investigation, law enforcement also conducted surveillance during which they observed NIKOGHOSYAN and BEKMURATOV meeting with members of KAVKAZ in and around Brooklyn, New York, among other places. The defendants have also appeared together in, among other places, pictures posted to public social media accounts.

12. Co-conspirator-1 is also an associate of KAVKAZ and has been involved in the extortion of Victim-1 to the extent described below.

Overview of the Extortion of Victim-1

13. As described in further detail below, Victim-1 is a former associate of the defendants. The investigation has revealed that in or about December 2020 or January 2021, Victim-1 began to work for NIKOGHOSYAN; specifically, Victim-1 delivered packages at NIKOGHOSYAN's direction in exchange for compensation. At some point thereafter, Victim-1 learned that the contents of his deliveries contained marijuana and declined to continue working for NIKOGHOSYAN. NIKOGHOSYAN became angry with Victim-1 for refusing to work for

NIKOGHOSYAN and negatively impacting NIKOGHOSYAN's narcotics sales business. NIKOGHOSYAN asserted that Victim-1's refusal to work cost NIKOGHOSYAN \$5,000, which Victim-1 would now have to pay NIKOGHOSYAN. When Victim-1 declined, NIKOGHOSYAN threatened Victim-1 with physical harm. Victim-1 temporarily obliged NIKOGHOSYAN by again participating in marijuana sales, but subsequently declined to participate. Thereafter, NIKOGHOSYAN stated that Victim-1 owed NIKOGHOSYAN \$10,000, and if Victim-1 did not pay such money, Victim-1 would face physical harm.

14. In the weeks to follow, when Victim-1 declined to pay, or stated that s/he was unable to pay NIKOGHOSYAN, NIKOGHOSYAN again threatened Victim-1 with physical harm. NIKOGHOSYAN engaged BAZAROV and BEKMURATOV to assist NIKOGHOSYAN in the extortion of Victim-1 by acting as intermediaries. Specifically, BAZAROV and BEKMURATOV agreed to solicit the payment from Victim-1 on behalf of NIKOGHOSYAN, while reiterating to Victim-1 that NIKOGHOSYAN had threatened to use physical force were Victim-1 not to make the extortionate payment. Ultimately, Victim-1 made two extortionate payments to the defendants (which payments were provided by and at the direction of law enforcement): a \$1,000 payment to BEKMURATOV via the Zelle money transfer application, and a second \$1,000 payment to BEKMURATOV in person. Thereafter, as the defendants had agreed, BEKMURATOV transferred some or all of the extortionate funds paid by Victim-1 to NIKOGHOSYAN.

15. The defendants conspired to continue to extort Victim-1 for additional payments thereafter. For example, after the first payment, NIKOGHOSYAN's demanded that BAZAROV obtain a larger and more expeditious payment from Victim-1, following which BAZAROV attempted to "lure" Victim-1 to an in-person meeting with NIKOGHOSYAN.

Likewise, following the second payment, BEKMURATOV directed Victim-1 to continue to make payments to NIKOGHOSYAN, through BAZAROV as an intermediary.

Victim-1's Involvement with NIKOGHOSYAN

16. In or about December 2020 or January 2021, Victim-1 was looking for a job. Around that time, an acquaintance introduced Victim-1 to NIKOGHOSYAN, who offered Victim-1 a job to pick up packages at locations throughout the New York area, specifically Queens and Brooklyn, and transport the packages to NIKOGHOSYAN at an apartment located in Brooklyn, New York ("Apartment-1"). NIKOGHOSYAN provided Victim-1 directions regarding pick-up and drop-off locations. Victim-1 was generally paid approximately \$100 per day and delivered up to two packages per day.

17. However, in or about approximately late January 2021, NIKOGHOSYAN opened one such package in front of CS-1. CS-1 observed what s/he believed to be marijuana in the package. In that instance, according to CS-1, the package had red-lined tape on the top of the package and contained a toaster oven with coffee packed around the sides of the toaster oven. Large quantities of marijuana were stowed inside of the toaster oven. CS-1 subsequently saw marijuana in similar packages that s/he had picked up at NIKOGHOSYAN's direction on other occasions. According to CS-1, at a certain point following the discovery that the packages s/he was delivering contained marijuana, s/he ceased working for NIKOGHOSYAN and discontinued contact with him.

18. Subsequently, Victim-1 received communications from individuals who notified Victim-1 that NIKOGHOSYAN was looking to assault Victim-1 because Victim-1 had refused to continue working for NIKOGHOSYAN. For example, I have reviewed a series of

text messages sent from an individual (“Individual-1”) to Victim-1’s cellular telephone, on or about January 20, 2021, which stated:

Individual-1: Yoo

Individual-1: Roma just stopped me on high way

Individual-1: He was asking Abkut u and shit

Individual-1: He was saying he gonna Fick u up and who ever chills with u and shit

Individual-1: Straight the shit out bro u know how he is

19. Based upon my training and experience and involvement in this investigation, I believe that in the above-referenced texts, a friend of Victim-1 (Individual-1) told Victim-1 that NIKOGHOSYAN (“Roma,” which is short for Roman, NIKOGHOSYAN’s first name) stopped Individual-1 to tell Individual-1 that NIKOGHOSYAN was looking to assault or otherwise cause physical harm to Victim-1 or individuals associated with Victim-1 (“He was saying he gonna Fick u up and who ever chills with u and shit”). Moreover, Individual-1 appeared to be concerned for his own and/or Victim-1’s safety based on Individual-1’s awareness of NIKOGHOSYAN’s propensity to engage in acts of violence (“Straight the shit out bro u know how he is”).

NIKOGHOSYAN’S Demand for Extortion Payments from CS-1

20. Moreover, in or about January 2021, NIKOGHOSYAN, under the username “m*_a****”,³ sent the following messages, which I have reviewed, to Victim-1 via Instagram’s direct messaging service, seeking to extort Victim-1:

³ I believe that the Instagram username “m*_a****”, the unredacted version of which is known to me, is operated by NIKOGHOSYAN based upon, among other things, my review of his public Instagram profile page, which contains a photograph of NIKOGHOSYAN, among other things, and based on information provided by Victim-1.

NIKOGHOSYAN: I just try it's just going to voice mail

NIKOGHOSYAN: It's not supposed to go to voice mail when you not paying

NIKOGHOSYAN: You get my money today

NIKOGHOSYAN: Or it's gonna be big problem I promise you

NIKOGHOSYAN: I don't care about anything you saying

NIKOGHOSYAN: Where we meeting up?

21. Based upon my training, experience and involvement in this investigation, I believe that, in the above-referenced messages, NIKOGHOSYAN stated his belief that Victim-1 was still in possession of Victim-1's cell phone and was therefore ignoring NIKOGHOSYAN ("It's not supposed to go to voice mail when you not paying") and that NIKOGHOSYAN would cause physical harm to Victim-1 if Victim-1 declined to make extortionate payments to NIKOGHOSYAN ("You get my money today ... [o]r it's gonna be big problem I promise you").

22. According to Victim-1, in or about February 2021, NIKOGHOSYAN told Victim-1 that because s/he stopped working for NIKOGHOSYAN, Victim-1 owed \$5,000 to NIKOGHOSYAN and had two weeks to pay. Thereafter, NIKOGHOSYAN threatened Victim-1 in-person, indicating that Victim-1 would face physical harm if s/he failed to make the extortionate payment to NIKOGHOSYAN.

23. Thereafter, Victim-1 re-engaged with NIKOGHOSYAN because of the purported debt s/he owed for harming NIKOGHOSYAN's narcotics sales (by declining to continue to transport packages for NIKOGHOSYAN) and for fear of his/her physical safety, as well as the safety of those close to him/her. Victim-1 agreed to sell marijuana at NIKOGHOSYAN's behest, including through hand-to-hand sales. Victim-1 was given gas money by NIKOGHOSYAN but was not paid for his/her services. In or about late February or

early March 2021, Victim-1 declined to continue to sell marijuana for NIKOGHOSYAN and attempted to distance from NIKOGHOSYAN for a second time.

24. Following this, according to Victim-1, NIKOGHOSYAN told Victim-1 that Victim-1 now owed NIKOGHOSYAN \$10,000 because Victim-1 stopped working for NIKOGHOSYAN. Victim-1 did not have the money to pay NIKOGHOSYAN, which Victim-1 told NIKOGHOSYAN. Victim-1 recalls that NIKOGHOSYAN, responded, in sum and substance and in part, “things stopped because you aren’t working.” NIKOGHOSYAN told Victim-1, in-person and while BAZAROV was also present, that NIKOGHOSYAN would break Victim-1’s legs and stab him or her if Victim-1 did not pay NIKOGHOSYAN.

25. NIKOGHOSYAN additionally told friends of Victim-1 to notify Victim-1 that NIKOGHOSYAN was looking for Victim-1. I have reviewed at least one text message, described above, from Individual-1, which corroborates those statements. Victim-1 has stated that s/he was scared for his/her life and believed NIKOGHOSYAN would hurt or kill Victim-1 or his/her family. At the time of NIKOGHOSYAN’s demands, Victim-1 was aware that NIKOGHOSYAN had threatened others in the past to pay him money to avoid physical violence and that NIKOGHOSYAN has previously stabbed at least one individual.⁴

Threats to Victim-1 Leading Up to April 5, 2021 Auto Body Shop Incident

26. According to Victim-1, on April 4, 2021, BAZAROV, using a telephone assigned call number 585-***-****⁵ (the “BAZAROV Telephone”) via the Telegram

⁴ According to criminal history reports, which I have reviewed, NIKOGHOSYAN has been arrested on seven occasions, four times for felonies three times for misdemeanors. He has been convicted of two felonies, including a violent felony, and of the three misdemeanors.

⁵ I have used asterisks to anonymize certain phone numbers for privacy purposes. In each instance in which I have done that, I am aware of the phone number in its entirety.

application, sent Victim-1 private messages, which I have reviewed, explaining that Victim-1 needed to see NIKOGHOSYAN. BAZAROV also called Victim-1 via the Telegram application, which calls Victim-1 declined (i.e., “cancelled”). Subsequently, according to Victim-1, Victim-1 met with BAZAROV, and the two discussed Victim-1 meeting with NIKOGHOSYAN on the night of April 4, 2021; however, Victim-1 did not show up to that meeting.

27. The next day, on April 5, 2021, the following text message exchange, which I have reviewed, took place from 3:59 p.m. to 4:11 p.m., between Victim-1 and BAZAROV, using the BAZAROV Telephone, parts of which are translated⁶ from Uzbek and Russian and others parts of which were in English:

BAZAROV: [Victim-1], did you lie again? You do not respect me at all, motherfucker. If I start looking for you, you’ll not be happy.

Victim-1: Bro, no one lie to you. I told you I do not want to see him. I do not want to meet him.

BAZAROV: Motherfucker, you promised me to come yesterday and did not reply to my text messages.

Victim-1: You do not have to look for me, bro. I am always around. You told me to come see you. I came I respect you with everything. Because I have more important things going on. No point of talking to him. I do not own him nothing and you know that.

BAZAROV: You should keep your promise, it does not matter what is going on around.

Victim-1: Because my friend telling me, it is no point meeting him. How about he is going to stab me or do something over nothing, because I do not want to work for him. That’s the only reason, bro. Come on.

BAZAROV: Motherfucker, you listen to your friends in this situation and when you have fucked-up situation you call me.

⁶ All translations are in draft form and subject to revision.

Victim-1: If I borrowed money and I did not pay him, it would be whole different story. Bro, I cannot meet him right now maybe next Sunday. I need my friend next to me. He will be back on Sunday.

BAZAROV: [Victim-1], I'll wait for you tomorrow. Come and see me.

Based upon my training and experience and knowledge of this investigation, I believe that, in the above-referenced messages, among other things, BAZAROV sought to get Victim-1 to meet with BAZAROV and/or NIKOGHOSYAN ("him") in order to aid BAZAROV and/or NIKOGHOSYAN in collecting a purported debt from Victim-1. However, Victim-1 declined to meet BAZAROV and/or NIKOGHOSYAN because Victim-1 was scared that NIKOGHOSYAN would "stab me or do something over nothing."

28. According to Victim-1, subsequent to the above-described exchange, on April 5, 2021, Victim-1 and a companion ("Individual-2") drove to an autobody shop located in south Brooklyn. Prior to arrival, at approximately 6:00 p.m., Victim-1 called the receptionist ("Clerk-1") at the auto body shop at the following number: 718-***-**** (the "Clerk-1 Telephone"). Victim-1 was aware that Clerk-1 was friends with another individual associated with KAVKAZ ("Co-conspirator-1") and that Co-conspirator-1 had previously worked at the same auto body shop.

29. According to Victim-1, around 6:10 p.m. to 6:20 p.m., Victim-1 was in a vehicle in the vicinity of the auto body shop, where s/he saw NIKOGHOSYAN walking in the middle of the street with what appeared to be something in his hand. Victim-1 was intimidated and scared for his/her safety. NIKOGHOSYAN and multiple other individuals approached the car that Victim-1, Individual-2, and Victim-1's friend ("Individual-3") were in. Victim-1 was able to identify Co-conspirator-1 (by Co-conspirator-1's true name) and NIKOGHOSYAN as two of the individuals that approached the car.

30. According to Victim-1, Individual-2 pulled out his/her phone during the time NIKOGHOSYAN, Co-conspirator-1 and others surrounded the car, which prompted NIKOGHOSYAN to scream, in sum and substance and in part, “put your phone down.” NIKOGHOSYAN also yelled at Victim-1, in sum and substance, “come out of the car, pussy.” Victim-1 did not, and ultimately drove away from the auto body shop. Victim-1 was fearful for his/her life.

31. Surveillance footage provided by an adjacent business shows multiple individuals surrounding Victim-1’s car.

32. After the confrontation, at approximately 6:42 p.m., Victim-1 texted BAZAROV, using the BAZAROV Telephone, stating, “If he does not stop that, I’ll file a complaint. I have already received my order of protection.”

33. At approximately 6:48 p.m., Victim-1 called 911 to report the incident to the NYPD, which NYPD records I have reviewed.

34. Pen register and trap and trace data from a mobile telephone assigned the number 929-***-****, used by NIKOGHOSYAN (the “NIKOGHOSYAN Telephone”) demonstrates, among other things, that: (i) at approximately 5:50 p.m., the NIKOGHOSYAN Telephone called the BAZAROV Telephone, which called lasted for approximately 32 seconds; (ii) the NIKOGHOSYAN Telephone received a call from telephone number 929-***-****, which I believe was being used by Co-conspirator-1 (the “Co-conspirator-1 Telephone”) at 5:57 p.m., which call lasted approximately 33 seconds; (iii) the NIKOGHOSYAN Telephone called the BAZAROV Telephone at 6:24 p.m., which call lasted approximately 31 seconds; (iv) the NIKOGHOSYAN Telephone sent a text message to the BAZAROV Telephone at 6:24 p.m.; (v) the NIKOGHOSYAN Telephone sent a text message to the BAZAROV Telephone at 6:25 p.m.;

(vi) the BAZAROV Telephone called the NIKOGHOSYAN Telephone at 6:35 p.m., which call lasted approximately 2 minutes; (vii) the BAZAROV Telephone called the NIKOGHOSYAN Telephone at 6:41 p.m., which call lasted approximately 4 minutes and 41 seconds. Shortly thereafter, BAZAROV, using the BAZAROV Telephone, called Victim-1 and stated, in sum and substance and in part, that if Victim-1 did not go see NIKOGHOSYAN immediately, Victim-1 would have a big problem.

35. Based on my training and experience, and knowledge of the investigation, I believe that the pen register and trap and trace data described in the preceding paragraph demonstrates that NIKOGHOYSAN called Co-conspirator-1 shortly before both individuals arrived at the auto body shop to threaten Victim-1. In addition, following the incident, NIKOGHOYSAN had a series of telephone and text message communications with BAZAROV. Thereafter, BAZAROV threatened Victim-1. I believe, based on my training, experience and knowledge of the investigation, that BAZAROV's text messages to Victim-1, described above, around the time of the incident demonstrate BAZAROV's involvement in the extortion of Victim-1 and BAZAROV's agreement with NIKOGHOSYAN to extort Victim-1.

First Extortionate Payment from Victim-1 to the Defendants

36. On or about April 28, 2021, beginning at approximately 8:28 p.m., BAZAROV, using the BAZAROV Telephone, sent several messages over the Telegram application to Victim-1, which messages were in Uzbek.⁷ In sum and substance and in relevant part, BAZAROV asked Victim-1 whether Victim-1 had reached out to NIKOGHOSYAN. BAZAROV then stated that he (BAZAROV) had paid "Roma" (a reference to ROMAN

⁷ Victim-1 has provided law enforcement agents with copies of these messages, which have been translated in draft form.

NIKOGHOSYAN) and if Victim-1 wants to keep normal relations, Victim-1 needed to send BAZAROV “2K.”

37. Based on my training, experience and knowledge of the investigation, I believe that, in the above-referenced Telegram messages, BAZAROV demanded \$2,000 (“2K”) and threatened Victim-1 with harm if Victim-1 did not pay (“keep normal relations”). In addition, BAZAROV stated that he had paid “Roma” (a reference to NIKOGHOSYAN) “2K” of Victim-1’s purported debt to NIKOGHOSYAN, and therefore Victim-1 would be required to pay \$2,000 to BAZAROV.

38. On May 31, 2021, at approximately 8:00 p.m., Victim-1 called BEKMURATOV, which call was consensually recorded by Victim-1 at the direction of law enforcement, during which NIKOGHOSYAN’s extortion of Victim-1 was discussed:

BEKMURATOV: You want my advice? You come, you bring whatever money you can bring and fucking take it as a man, he is not going to stab you for sure.

Victim-1: No, I’m not gonna see this guy bro, I just want to pay him . . . I don’t owe him nothing and everybody knows that, he is just [UI] that I fucked up his business.

BEKMURATOV: Come back . . . he is not gonna stab you.

Victim-1: I don’t trust this guy and I don’t trust Dilshod. Dilshod was gonna help me and then he changed his number.

BEKMURATOV: [UI]I know what what happened, Roma told me, that he paid for you and then he told you to pay Dilshod and you paid neither.

Victim-1: Okay bro, if I give you the money can you give it to him?

BEKMURATOV: Okay, how much you gotta give? [UI]

Victim-1: Idk bro . . . I don’t know how much he is telling me I owe him bro, I really don’t understand how much I owe him

because I don't owe him nothing. So I have \$2000 right now... I can give it to you like you can give it to him.

Victim-1: How do I owe him the money? Did I borrow the money from him?

BEKMURATOV: From his story, look, this is what he [NIKOGYOSHAN] said [UI]... did you talk to him something you're going to sell weed?

Victim-1: When?

BEKMURATOV: When you started, when you started selling

Victim-1: Nah, he didn't tell me, he didn't tell me, he is spreading rumors bro, he didn't tell me that was the weed he told me I was gonna pick up the boxes, that is how all of this started bro. He told me I was going to pick up the boxes and that is all he said....Then later on, after three four days, I find out that this is weed inside and I told him I'm not gonna do it. He's telling me since you told me you're not gonna do it now you owe me this. So I gotta disappear and then he started calling me and giving me a time that I gotta give him the money for.... He's tell me he is gonna stop me, he is gonna hurt me....

BEKMURATOV: Just come, he's not gonna stab you, I'll make sure he is not gonna stab you.

Victim-1: Ok, bro.

BEKMURATOV: You might get like fucking knocked [UI] maximum. Just let me know when you want to come. I'll set it up....Bring some money, too, so we can give him.

Victim-1: Okay, thank you.

39. Based on my training, experience and knowledge of the investigation, I believe that BEKMURATOV told Victim-1 to meet with and pay NIKOGHOSYAN ("You want my advice? You come, you bring whatever money you can bring and fucking take it as a man.").

BEKMURATOV further advised that NIKOGHOSYAN said that Victim-1 owes the money because Victim-1 was supposed to sell weed for NIKOGHOSYAN (“From his story, look, this is what he [NIKOGYOSHAN] said [UI]... did you talk to him something you’re going to sell weed?). BEKMURATOV then attempted to assure Victim-1 that NIKOGHOSYAN would not stab Victim-1 (“Just come, he’s not gonna stab you, I’ll make sure he is not gonna stab you.”), although NIKOGHOSYAN might assault Victim-1 (“You might get like fucking knocked [UI] maximum.”).

40. Then, thirteen minutes later, at 8:13 p.m. on May 31, 2021, Victim-1 called BEKMURATOV and suggested giving BEKMURATOV \$2,000 for BEKMURATOV to give to NIKOGHOSYAN on Victim-1’s behalf. BEKMURATOV responded, “OK . . . how do you want to bring me the money?” and that he would “send [Victim-1] the number for Zelle,” the cash transfer method. Shortly thereafter, at approximately 8:15 p.m., BEKMURATOV sent a text message to Victim-1 with a phone number “646-***-****.”

41. Based on my training, experience and knowledge of the investigation, I believe that BEKMURATOV agreed to accept and transfer the extortionate payment from Victim-1 to NIKOGHOSYAN (“OK . . . how do you want to bring me the money?”). BEKMURATOV then sent Victim-1 a phone number that Victim-1 should use to transfer BEKMURATOV the money (“send [Victim-1] the number for Zelle.”).⁸

⁸ As explained in more detail below, I know that the number BEKMURATOV sent to NIKOGHOSYAN (646-***-****) is a Zelle account used by BEKMURATOV, because Victim-1 successfully made a payment to BEKMURATOV using that account at the direction of law enforcement.

42. Shortly thereafter, at 1:29 a.m. on June 1, 2021, BEKMURATOV called NIKOGHOSYAN on the NIKOGHOSYAN Telephone, which call was intercepted pursuant to a judicially authorized wiretap:

BEKMURATOV: Also [Victim-1] called me today again. He said, uh bro I am going to send you the money give it to Roma. So he is supposed to send the money for you tomorrow 2k in the morning from that we can send also.

NIKOGHOSYAN: That nigga lying bro.

BEKMURATOV: Bro this bitch ass nigga, I told him I said stop fucking [UI] around with it. That's cause I didn't want to tell you, I didn't want to bring this shit up because bitch ass nigga didn't send it, cause that's why I don't trust him [UI].

NIKOGHOSYAN: He's lying, he's lying, he's lying, he's lying [UI]. Tell that nigga Roma don't need your money bro that nigga is a bitch bro, he's a red ass nigga.

BEKMURATOV: I know bro but he's fucking calling saying this stupid shit, "I'm gonna send the money," then send the money.

NIKOGHOSYAN: [UI] Then tell him to send it to Dilshod.

BEKMURATOV: Hmm.

NIKOGHOSYAN: Nah nigga, nigga ain't no good, bro.

BEKMURATOV: Yeah, I know he's not good, that's why I told him just fucking send the money and then were gonna [UI] stop talking.

NIKOGHOSYAN: I hate when nigga be like that, just talking, a deals a deal but [UI] business is the worst shit he can do.

43. Based on my training, experience and knowledge of the investigation, I believe that BEKMURATOV was informing NIKOGHOSYAN that Victim-1 was going to send BEKMURATOV \$2,000 ("2k") in partial satisfaction of the money NIKOGHOSYAN was

demanding from Victim-1 (“[Victim-1] called me today again. He said, uh bro I am going to send you the money give it to Roma.”).

44. On June 1, 2021, at law enforcement’s direction, Victim-1 sent \$1,000 via the Zelle money transfer application to the number provided by BEKMURATOV.

45. On June 2, 2021, NIKOGHOSYAN, using the NIKOGHOSYAN Telephone called BAZAROV, at 1:19 p.m., which call was intercepted pursuant to a judicially authorized wiretap. Therein, in sum and substance and in part, NIKOGHOSYAN pressed BAZAROV about obtaining money for NIKOGHOSYAN. BAZAROV stated that NIKOGHOSYAN does not understand the “challenges” in collecting payments. NIKOGHOSYAN then stated that he needed money and did not “have time to wait.” BAZAROV responded that he understood. NIKOGHOSYAN then followed up by saying, “Then bring me [Victim-1]. That’s it, bro. Bring the nigga here, today. That’s it.” BAZAROV then asked if NIKOGHOSYAN knew Victim-1’s whereabouts, and NIKOGHOSYAN stated that he did not. Based upon my training, experience, and involvement in the investigation, I believe that in this call, in short, NIKOGHOSYAN expressed to BAZAROV that NIKOGHOSYAN wanted to see Victim-1 to obtain an extortionate payment from Victim-1, to assault Victim-1, or both.

46. Then, at 1:31 p.m. on June 2, 2021, at the direction of law enforcement, Victim-1 called BEKMURATOV, on a consensually recorded call, and Victim-1 asked BEKMURATOV if he “gave him (NIKOGHOYSAN) the money” to which BEKMURATOV responded, “Yeah, I gave him (NIKOGHOYSAN).” Victim-1 then told BEKMURATOV that “Dilshod (BAZAROV) just texted” Victim-1. BEKMURATOV further advised Victim-1 that BEKMURATOV gave NIKOGHOSYAN the “\$1,000 yesterday but he (NIKOGHOSYAN) was

asking for \$10,000.” When Victim-1 asked how Victim-1 now owed NIKOGHOSYAN \$10,000, BEKMURATOV responded, “I have no idea bro, but I gave him \$1,000 yesterday but he said they asking \$10,000 and this other guy promised him that he [BAZAROV] is going to pay him back for you.” BEKMURATOV explained that BAZROV might be required to pay NIKOGHOSYAN the money that Victim-1 purportedly owed NIKOGHOSYAN, at which point Victim-1 would be required to reimburse BAZAROV.

47. Based on my training, experience and knowledge of the investigation, I believe that BEKMURATOV informed Victim-1 that while he received the Zelle transfer from Victim-1 and gave that extortionate payment to NIKOGHOSYAN (“Yeah, I gave him”; “I gave him \$1,000 yesterday”), that \$1,000 did not satisfy the alleged debt, and that Victim-1 now owed NIKOGHOSYAN \$10,000, not \$1,000 (“he was asking for \$10,000”). Additionally, I believe NIKOGHOSYAN told BEKMURATOV that BAZAROV (“Dilshod”) was supposed to pay NIKOGHOSYAN \$10,000 in fulfillment of the purported “debt” that Victim-1 owed NIKOGHOSYAN (“he said they asking \$10,000 and this other guy promised him that he is going to pay him back for you”), after which Victim-1 would be required to pay BAZAROV back.

48. Shortly thereafter, on June 2, 2021 at 1:44 p.m., BEKMURATOV and Victim-1 again spoke on the phone, which call was consensually recorded by Victim-1 at the direction of law enforcement. During this conversation BEKMURATOV told Victim-1 that “[Victim-1] should come to Brooklyn.” Victim-1 responded that Victim-1 did not want to see NIKOGHOSYAN and thus cannot go to Brooklyn. BAZAROV (“Dilshod”) then joined the conversation and said that “he has already solved [Victim-1’s] problem” and that Victim-1 “should stop avoiding meeting with Roma and [don’t be] scared.”

49. A few minutes later, at 1:48 p.m. on June 2, 2021, BAZAROV called Victim-1, which call was consensually recorded by Victim-1 at the direction of law enforcement. BAZAROV asked Victim-1 why he “is avoiding Roma (NIKOGHOSYAN).” BAZAROV then informed Victim-1 that he (BAZAROV) is “ready to solve [Victim-1’s] problem and help” and that Victim-1 “should come and meet with” BAZAROV and NIKOGHOSYAN.

50. During the above conversations, based on my training, experience and involvement in the investigation, I believe that BEKMURATOV and BAZAROV were attempting to get Victim-1 to come to Brooklyn to meet with NIKOGHOSYAN (“come to Brooklyn”; “come and meet”). Additionally, I believe that BAZAROV was attempting to convince Victim-1 that NIKOGHOSYAN would not hurt Victim-1 (“[don’t] be scared”) because BAZAROV is “ready to solve [Victim-1’s] problem.”

51. Later that same day, on June 2, 2021, NIKOGHOSYAN, using the NIKOGHOSYAN Telephone, called BAZAROV, at 3:52 p.m., which call was intercepted pursuant to a judicially authorized wiretap. BAZAROV indicated that he spoke to Victim-1 and is trying to “lure [Victim-1] in” to “get it done today” and that Victim-1 “is in Connecticut.” BAZAROV stated that he got Victim-1’s number from “Mirza” (BEKMURATOV). NIKOGHOSYAN said that “Mirza is with me now.” BAZAROV responded that they, referring to BAZAROV and Victim-1, “will have a conversation today.” NIKOGHOSYAN responded, “we need to do this fast; I have to [UI] my business. [Victim-1] sent \$1000 to him (BEKMURATOV), yesterday or the day before but the \$1000 doesn’t make a dent. How much should we send there, \$3500, right?” BEKMURATOV then said in the background, “We sent \$4000 yesterday” and NIKOGHOSYAN then stated to BAZAROV, “I need \$4000 today, bro.” BAZAROV responded, “[w]ell then let’s find, uh... [UI] and have a normal conversation.”

NIKOGHOSYAN responded, “Conversation, conversation... I need that money, bro!”

BAZAROV said that he would make a call and then call NIKOGHOSYAN back.

52. I believe that during this conversation, BAZAROV informed NIKOGHOSYAN that BAZAROV was trying to get Victim-1 to come to Brooklyn (“lure [Victim-1] in”) so that NIKOGHOSYAN can threaten and or harm Victim-1 to induce Victim-1 to pay NIKOGHOSYAN for the alleged harm Victim-1 did to NIKOGHOSYAN’s drug-dealing business. Moreover NIKOGHOSYAN indicated he was in a rush to get the extortion payment from Victim-1 (“get it done today”; “need to do this fast, I have to [UI] my business”) and implied that more than a conversation, i.e., violence or threats, might be necessary to induce immediate payment from Victim-1 (“Conversation, conversation... I need that money, bro!”).

Second Extortionate Payment from Victim-1 to the Defendants

53. Subsequently, on June 12, 2021, NIKOGHOSYAN, using the NIKOGHOSYAN Telephone, called BAZAROV, at 5:19 p.m., which call was intercepted pursuant to a judicially authorized wiretap. Among other things, NIKOGHOSYAN stated, in sum and substance and in part, that he was waiting for BAZAROV and others to “send me (NIKOGHOSYAN) money” and that NIKOGHOSYAN, who was in Los Angeles, California at the time, would “take care of my affairs in L.A. and come back.” NIKOGHOSYAN went on to say, “When this second thing happens . . . I’m waiting for that money, [Victim-1] money.” NIKOGHOSYAN further stated that he is “waiting on” BAZAROV. BAZAROV responded that he would call BEKMURATOV, and BAZAROV and NIKOGHOSYAN agreed to speak later.

54. On June 14, 2021, at approximately 8:11 p.m., law enforcement, conducting surveillance, observed BEKMURATOV meet with Victim-1 at a location on Coney Island Avenue in Brooklyn, New York, which meeting Victim-1 consensually recorded at the

direction of law enforcement. At this meeting, law enforcement observed Victim-1 hand BEKMURATOV cash, which payment was also made at the direction of law enforcement.

55. After receiving the cash and while still in the presence of Victim-1, BEKMURATOV called NIKOGHOSYAN at approximately 8:21 p.m., which call was intercepted pursuant to a judicially authorized wiretap, as well as Victim-1's consensual recording. On that call, BEKMURATOV stated, in sum and substance and in part, "Listen, Victim-1 sent me \$1,000 and uh... how do you want me to give it to you? Should I give it when I come?" Following BEKMURATOV's call with NIKOGHOSYAN, BEKMURATOV stated to Victim-1 that BEKMURATOV suspected law enforcement was surveilling the meeting and asked Victim-1 whether Victim-1 had brought law enforcement. BEKMURATOV then stated that Victim-1 should give "the rest of the money to [BAZAROV]."

56. Based on my training, experience and knowledge of the investigation, I believe that BEKMURATOV took custody of the extortionate payment from Victim-1 and then discussed with NIKOGHOSYAN the manner in which BEKMURATOV would provide the extortionate payment to NIKOGHOSYAN. Further, BEKMURATOV stated that Victim-1 should continue to make payments to NIKOGHOSYAN but should do so through BAZAROV going forward.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendants ROMAN NIKOGHOSYAN, DILSHOD BAZAROV and MIRZOBEK BEKMURATOV so that they may be dealt with according to law.

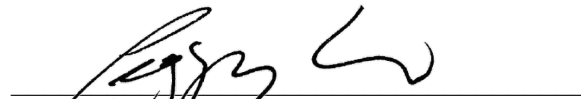
I further request that the Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the affidavit and arrest warrant. Based upon my training and experience, I have learned that criminals actively search for criminal affidavits and arrest warrants via the internet. Therefore, premature disclosure of the contents of this affidavit and related documents will seriously jeopardize the investigation, including by giving the defendant an opportunity to flee, destroy or tamper with evidence and change patterns of behavior.

Respectfully submitted,



Todd McGee
Special Agent
Federal Bureau of Investigation

Sworn to before me by telephone this
19th day of July, 2021



THE HONORABLE PEGGY KUO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

United States of America

v.

ROMAN NIKOGHOSYAN,
also known as "Roma,"

Case No. 21-MJ-832

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) ROMAN NIKOGHOSYAN,
who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Hobbs Act extortion conspiracy, in violation of Title 18, United States Code, § 1951(a).

Date: 07/19/2021

Issuing officer's signature
City and state: Brooklyn, New York
Peggy Kuo, USMJ
Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

Arresting officer's signature
Printed name and title

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

United States of America

v.

DILSHOD BAZAROV,

Case No. 21-MJ-832

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
 (name of person to be arrested) DILSHOD BAZAROV,
 who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Hobbs Act extortion conspiracy, in violation of Title 18, United States Code, § 1951(a).

Date: 07/19/2021

Issuing officer's signature
City and state: Brooklyn, New YorkPeggy Kuo, USMJ*Printed name and title*

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
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Date: _____

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Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

United States of America

v.

MIRZOBEC BEKMURATOV,
also known as "Mirza,"

Case No. 21-MJ-832

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) MIRZOBEC BEKMURATOV,
who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Hobbs Act extortion conspiracy, in violation of Title 18, United States Code, § 1951(a).

Date: 07/19/2021

Issuing officer's signature
City and state: Brooklyn, New YorkPeggy Kuo, USMJ*Printed name and title*

Return

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at (city and state) _____.

Date: _____

*Arresting officer's signature**Printed name and title*

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